

Mr. A. E. Purvis
Gleason Romans Pipe Line
Patrol Company
P. O. Box 51283
Tulsa, Oklahoma 74151

Dear Mr. Purvis:

I wish to apologize for the lengthy delay in answering your letter. Your letter concerned various applications of the class location definitions located in Section 192.5 of the Minimum Federal Gas Pipeline Safety Standards.

In your first question you asked whether the terminal point of a class 2 location would be 1/8 mile from the point where the last residence is located, or 1/8 mile from the nearest point on the pipeline to the last residence.

Paragraph 192.5(c) states that a class 2 location is one where the class location unit has more than ten but less than forty-six buildings intended for human occupancy. The dividing point between a class 2 and class 1 location, therefore; would be where the class location unit, as defined in Paragraph 192.5(a), contains more than ten buildings.

Your second question concerned three examples where two buildings or groups of buildings were located within one mile of each other but where there are a substantial distance between the two buildings or groups of buildings. You requested our indication of the class location in each example.

In your example, Figure 2(a), the "ten units apartment" and "single unit" would initially be classified as a class 2 location due to having more than ten units. However, under sub-paragraph 192.5(f)(3) this classification could be changed to a class location 220 yards both from the apartment building and the single unit. This same reasoning would apply to your other two examples, Figure 2(b) and Figure 2(c).

the definition of a gathering place that is occupied by twenty or more persons during normal use if left to the reasonable consideration and judgment of the operator. The main point that the operator must consider is what the " normal use" of the building or area is. For example, a factory which houses forty persons during an 8-hour shift per day operation would be considered by us to be a building occupied by twenty or more persons during normal use. A cemetery in a

small town used infrequently, on the otherhand, would not require the application of class 3 requirements, since the normal use of the cemetery would be for no living people to be present.

The answer to your last question, a place where twenty or more people work within 100 yards of a pipeline would require that the line fulfill class 3 requirements.

If we can be of any further assistance, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell
Acting Director
Office of pipeline Safety